

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

WILLIAM ALLEN ROBERTS)	
)	
COMPLAINANT)	
)	CASE NO.
V.)	2011-00314
)	
TAYLOR COUNTY RURAL ELECTRIC)	
COOPERATIVE CORPORATION)	
)	
DEFENDANT)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION TO
TAYLOR COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION

Taylor County Rural Electric Cooperative Corporation ("Taylor County"), pursuant to 807 KAR 5:001, is to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due no later than 14 days from the date of issuance of this request. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and

accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Taylor County shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Taylor County fails or refuses to furnish all or part of the requested information, Taylor County shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request.

1. Does Taylor County acknowledge that it may exercise, pursuant to KRS 279.110(4) and any other applicable law, the right of eminent domain?

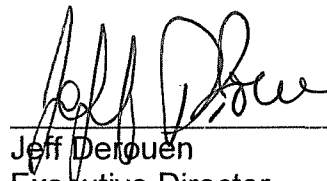
2. Explain why Taylor County has not attempted to exercise its right of eminent domain so that electric utility service could be extended to the Roberts' property.

3. Refer to page 8 of Taylor County's November 10, 2011 Response to question 8 of Commission Staff's First Request for Information. Three separate routes to the Roberts' property are identified. Regarding the cost of constructing facilities to provide electric service to William Allen Roberts' cabin:

a. Provide an estimate of the total cost of each of the alternative distribution routes available to the Roberts' cabin as described on page 8. Also include

with this estimate the cost of each route if installed as overhead only, rather than as a combined overhead and underground route.

b. For each route identified in a. above, provide the amount that Taylor County alleges would be the responsibility of Taylor County and the amount that would be the responsibility of William Allen Roberts under the terms of 807 KAR 5:041, Section 11.



Jeff Derouen
Executive Director
Public Service Commission
P.O. Box 615
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DATED JAN 03 2012

cc: Parties of Record

Case No. 2011-00314

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